UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ALLIANCE FOR AUTOMOTIVE INNOVATION,

Plaintiff,

v.

CIVIL ACTION NO. 1:20-cv-12090-DPW

MAURA HEALEY, ATTORNEY GENERAL OF THE COMMONWEALTH OF MASSACHUSETTS in her official capacity,

Defendant.

FURTHER MODIFIED STIPULATION

The Office of the Attorney General stipulates that it does not intend to, and will not, issue the notice discussed in Section 4 of the Data Access Law until after the Court rules on counts 1 and 2 of the plaintiff's complaint. Similarly, the Office of the Attorney General stipulates that it does not intend to, and will not, exercise its enforcement authority under Chapter 93A, Chapter 93K, or otherwise, to enforce any provision of the Data Access Law until after the Court rules on counts 1 and 2 of the plaintiff's complaint. The Office of the Attorney General reserves the right to revise this stipulation in the event that adjudication of those claims is delayed beyond March 7, 2022, but further stipulates that it will do so only after first providing 14 days' advance notice to the plaintiff and the Court of its intent to do so.

Respectfully submitted,

MAURA HEALEY ATTORNEY GENERAL,

By her attorneys,

February 3, 2022

/s/ Robert E. Toone

Robert E. Toone, BBO No. 663249
Eric A. Haskell, BBO No. 665533
Phoebe Fischer-Groban, BBO No. 687068
Julia Kobick, BBO No. 680194
Christine Fimognari, BBO No. 703410
Assistant Attorneys General
Office of the Attorney General
One Ashburton Place
Boston, Mass. 02108
(617) 963-2178
robert.toone@mass.gov

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on February 3, 2022.

Robert E. Toone

Robert E. Toone

Assistant Attorney General